



IN THE DISTRICT COURT OF  
TULSA COUNTY, STATE OF OKLAHOMA

JOHN DOE, Individually, and on behalf  
of all others similarly situated,

Plaintiff

v.

SAINT FRANCIS HOSPITAL, INC.,  
d/b/a SAINT FRANCIS HEALTH  
SYSTEM,

Defendant.

Case No.: CJ-23-2373

Attorney Lien Claimed

Hon. Daman Cantrell

DISTRICT COURT  
FILED  
JUL 11 2023  
DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

**PLAINTIFF'S MOTION FOR PERMISSION TO PROCEED UNDER A PSEUDONYM**

1. This case arises from the non-consensual intrusion and disclosure into Plaintiff's personal and private matters – namely his protected health information.

2. Plaintiff requests permission to proceed under pseudonyms to protect his identity and his medical information from further public disclosure.

3. Plaintiff also moves the court to order Defendant to maintain the confidentiality of his identity by using only pseudonyms in all of their filings, including all exhibits in which his name appears.

4. Plaintiff John Doe is an adult male citizen of Oklahoma.

5. The Petition was filed on July 11, 2023.

6. Plaintiff will disclose his identity to the Court and Defendant at the direction of the Court.

7. Due to the nature of the claims of this case and the damages alleged, this case necessarily involves examination and consideration of Plaintiff's physical health status and

diagnoses and – importantly – his efforts to seek health treatments through Defendant’s electronic systems.

8. Plaintiff used pseudonyms to protect his identity from being released due to the highly personal and potentially stigmatizing medical information at issue, and the desire to prevent his private personal medical information from being spread further.

9. There are several factors which weigh in favor of allowing Plaintiff to proceed pseudonymously and entering an order that all parties use Plaintiff’s pseudonyms in all documents.

10. The first is the potential for embarrassment and social stigmatization given the nature of the Petition regarding the physical health, treatment, prior diagnoses, and care sought by Plaintiff.

11. Moreover, Plaintiff’s claims sound in intrusion upon seclusion into Plaintiff’s private and personal affairs. By allowing Plaintiff to proceed pseudonymously, Plaintiff seeks to limit his damages further, by limiting, to the extent possible, the necessity of his name on public dockets and filings with his medical records.

12. Additionally, there is a lack of any prejudice to Defendant, actual or otherwise. Courts routinely enter stipulated orders protecting the personal medical information of parties which include forbidding the disclosure of identifiable personal information or personal identifiable information.

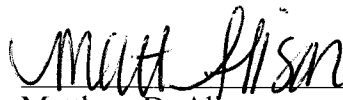
13. Plaintiff does not seek to seal the case, nor does he desire the facts to be shielded from the public eye — Plaintiff merely seeks to prevent the disclosure of his actual name as part of a public record.

14. There is no public interest in the disclosure of Plaintiff’s identity.

15. For the reasons stated above, Plaintiff seeks an order requesting permission to proceed under pseudonyms to protect his identity from public disclosure. As stated, Plaintiff will disclose his identity to the Court and the Defendant.

16. Plaintiff also moves the court to order Defendant to maintain the confidentiality of his identity by using only pseudonyms in all of their filings, including all exhibits in which his name appears.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11 day of July, 2023, a true and correct copy of the foregoing instrument was deposited in the United States mail, to the following persons, postage prepaid, first class:

Saint Francis Hospital, Inc.  
c/o Michael Lissau, Registered Agent  
6161 South Yale Avenue  
Tulsa, Oklahoma 74136

  
Matthew Alison